Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.

Mark Gordon, Governor

Todd Parfitt, Director

RECEIVED
JAN 16 2020

January 14, 2020

Mr. Carl Daly
Acting Director, Air and Radiation Division, EPA Region 8
1595 Wynkoop St.
Denver, CO 80202

Re: Initial Notification of Laramie River Station January 27, 2019 PM_{10} Exceptional Event

Dear Mr. Daly,

Attached is an initial notification of a high wind blowing dust exceptional event that occurred at the Laramie River Station (LRS) PM_{10} monitoring station on January 27, 2019 that led to an exceedance of the 24-hour PM_{10} NAAQS. The Wyoming Department of Environmental Quality – Air Quality Division (AQD) has evaluated the initial notification and circumstances surrounding this event and represents that it should be evaluated by Region 8 as a possible exceptional event. The exceedance covered by this initial notification is summarized in the table below.

Date	AQS ID	Monitor Name	Owner	24-Hour PM_{10} Concentration ($\mu g/m^3$)
1/27/2019	56-031-0805	PM10A	Laramie River Station	170.5

The AQD would like to request that the Administrator determine this possible event meets the provisions of 40 CFR 50.14 (a) (1) (F) as a regulatory determination made on a case by case basis. The AQD considers this event to be of regulatory significance because of the AQD's reliance on ambient data to determine compliance with the NAAQS at industrial facilities, the use of ambient data in AQD's permitting process, and third party interests. These reasons demonstrate the need to accurately portray anthropogenic versus non-anthropogenic or "exceptional" air quality issues to the public by means of excluding exceptional event concurred data from the data record.

In 1993 the AQD and EPA Region 8 signed a Memorandum of Agreement (MOA) to rely on ambient monitoring data at Powder River Basin coal mines to determine compliance with the 24-hour PM_{10} NAAQS under the AQD's permitting process, rather than modeling potential 24-hour PM_{10} impacts. In the decades since, the AQD has applied this same principal to other facilities across the state to demonstrate compliance with the 24-hour PM_{10} NAAQS. The exceedance that

the AQD is requesting Region 8 to review occurred at an industrial power plant that has permit conditions requiring them to demonstrate compliance with the PM_{10} NAAQS through the operation of a PM_{10} monitoring network. The AQD reports these data to EPA Region 8 through EPA's AQS database. Because the effectiveness of the AQD's permitting and compliance programs are contingent on the lack of PM_{10} NAAQS violations at required industrial monitoring stations, correctly reporting these data to EPA and AQS by placing exceptional event flags on these data is essential. The Region must take the appropriate steps to review and issue concurrence or non-concurrence on these data to accurately reflect the design value statistics in AQS and therefore accurately represent compliance with the NAAQS.

As mentioned above, the AQD relies on ambient industrial PM_{10} data at facilities to determine compliance with the 24-hour NAAQS in the permitting process. It is critical that exceedances and violations of the NAAQS are properly characterized in the permit analysis as being anthropogenic or exceptional in nature. The AQD cannot issue a permit to a source that will cause or contribute to a violation of the NAAQS. For facilities that cannot model their potential permitting action, the AQD must rely on the ambient data record to prove compliance with the NAAQS. In order to rely on these monitoring data for permitting actions, exceptional events must be properly characterized in the data record and must be documented to EPA per 40 CFR 50.14. This is especially important for the LRS exceedance covered by this initial notification because this monitor is currently at risk of violating the NAAQS for the 2017-2019 design value period.

It is also the AQD's stance that any exceedance caused by an exceptional event is significant and that it is important to demonstrate to the public the difference between exceedances that are anthropogenic versus those that are non-anthropogenic or exceptional in nature. Properly characterizing these exceedances in the public record and providing scientific evidence supporting the claim of exceptionality is essential to our shared role of serving the public. These data are used by the public, researchers, and other agencies to make scientific, public health, and policy decisions. These data must be properly flagged and concurred with in the EPA's AQS in order for those data to be handled correctly and reflect the monitor design values. Without the critical step of determining concurrence, data is often misused by these entities to support decisions.

Due to the above mentioned factors, the AQD considers this exceedance to meet the criteria of regulatory significance and requests that the Administrator make a determination under 40 CFR 50.14 (a) (1) (F) that the EPA will agree to review an exceptional event demonstration for this event.

Please contact Cara Keslar, Monitoring Section Supervisor, with questions at 307-777-8684.

Sincerely,

Darla J. Potter
Air Quality Resource Program Manager
Air Quality Division

Cc: Cara Keslar, AQD
Erin Fox Dukart, Laramie River Station

EE Initial Notification Summary Information

PM_{10} Exceedance

Submitting Agency: State of Wyoming – Air Quality Division
Agency Contact: Cara Keslar
Date Submitted:
Applicable NAAQS: 1987 PM_{10} 24-hr precision PM10 monitoring - 150μg /m^3 Limit
Affected Regulatory Decision[1]: (AQD will fill this section out per 50.14, option F)
(for classification decisions, specify level of the classification with/without EE concurrence)
Area Name/Designation Status: Attainment/Unclassifiable
Design Value Period (list three year period): 2nd Quarter 2016- 1st Quarter 2019
(where there are multiple relevant design value periods, summarize separately)

A) Information specific to each flagged monitor day that may be submitted to EPA in support of the affected regulatory decision listed above

Date of Event	Type of Event (high wind, volcano, wildfires/prescribed fire, other[2])	AQS Flag	Monitor AQS ID (and POC)	Monitor Name	Exceedance Concentration (with units)	Notes (e.g. event name, links to other events)
January 27, 2019	High Wind	IJ	56-031-0805-1	PM10A	170.5 µg /m³	Southeast Wyoming High Wind Dust Exceptional Event Demonstration: January 27, 2019, not yet submitted to EPA.

B) Violating Monitors Information

(listing of all violating monitors in the planning area, regardless of operating agency, and regardless of whether or not they are impacted by EEs)

Monitor (AQS ID and POC)	Design Value (without EPA concurrence on any of the events listed in table A above)	Design Value (with EPA concurrence on all events listed in table A above)
Laramie River Station PM10A Partisol 2000 (56-031-0805-1)	2.0	0.0

[1] designation, classification, attainment determination, attainment date extension, or finding of SIP inadequacy leading to SIP call
[2] Provide additional information for types of event described as "other"

C) Summary of Maximum Design Value (DV) Monitor Information (Effect of EPA Concurrence on Maximum Design Value Monitor Determination)

(Two highest values from Table B)

Maximum DV monitor (AQS ID and POC) **without EPA concurrence** on any of the events listed in table A above	Design Value 2.0	Design Value Monitor Laramie River Station PM10A Partisol 2000 (56-031-0805-1)	Comment
Maximum DV monitor (AQS ID and POC) **with EPA concurrence** on all events listed in table A above	Design Value 0.0	Design Value Monitor Laramie River Station PM10A Partisol 2000 (56-031-0805-1)	Comment

D) List of any monitors (AQS ID and POC) within planning area with invalid design values (e.g. due to data incompleteness)

Year	Quarter	Exceedances	Valid Days	Poss Days	Estimated Exceedances	Yearly Expected	w/EPA Concurrence
2016	2	0			0.0		
	3	0			0.0		
	4	0			0.0	0.0	
	1	0			0.0		
2017	2	0			0.0		
	3	0			0.0		
	4	0			0.0	0.0	
	1	0			0.0		
2018	2	0			0.0		
	3	0			0.0		
	4	0			0.0	0.0	
2019	1	1			6.0	6.0	
3YR TOTAL						2.0	0.0